

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JULIE DALESSIO, an individual,
Plaintiff,

v.

UNIVERSITY OF WASHINGTON, a
Washington Public Corporation; ELIZA
SAUNDERS, Director of the Office of
Public Records, in her personal and official
capacity; ALISON SWENSON, Compliance
Analyst, in her personal capacity; PERRY
TAPPER, Public Records Compliance
Officer, in his personal capacity; ANDREW
PALMER, Compliance Analyst, in his
personal capacity; JOHN or JANES DOES
1-12, in his or her personal capacity,
Defendants.

No. 2:17-cv-00642-MJP

DECLARATION OF JAYNE L.
FREEMAN IN SUPPORT OF
DEFENDANTS' OPPOSITION TO
PLAINTIFF'S MOTION FOR
RECONSIDERATION AND MOTION
TO AMEND COMPLAINT

I, Jayne L. Freeman, declare as follows:

1. I am appointed as Special Assistant Attorney General to represent Defendants in this lawsuit. I make this declaration based upon my own personal knowledge, upon facts which are admissible in evidence. I am competent to testify to the matters set forth in this declaration.

2. The following exhibits are cited or relied upon in Defendants' Opposition to Plaintiff's Motion for Reconsideration and Motion to Amend Complaint:

1 A. Attached as **Exhibit A** is a true and correct copy of email
2 correspondence between Plaintiff's former counsel Joseph Thomas and counsel for
3 Defendants.

4 B. Attached as **Exhibit B** is a true and correct copy of portions of
5 Plaintiff's Initial Disclosures.

6 C. Attached as **Exhibit C** is a true and correct copy of the public
7 records request to the University of Washington identified for tracking purposes as
8 PR 2019-00035.

9
10 I declare under penalty of perjury under the laws of the State of Washington that the
11 foregoing is true and correct to the best of my knowledge.

12
13 DATED this 3rd day of July 2019, at Seattle, Washington.

14
15 /s/ Jayne L. Freeman

16 Jayne L. Freeman, WSBA #24318
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CERTIFICATE OF SERVICE

I hereby certify that on July 3, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Plaintiff Pro Se

Ms. Julie Dalessio

1110 29th Avenue

Seattle, WA 98122

Phone: (206) 324-2590

Email: juliedalessio@msn.com

Courtesy copy also sent by e-mail.

and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

N/A.

DATED: July 3, 2019

/s/ Jayne L. Freeman

Jayne L. Freeman, WSBA #24318

Special Assistant Attorney General for
Defendant

801 Second Avenue, Suite 1210

Seattle, WA 98104

Phone: (206) 623-8861

Fax: (206) 223-9423

Email: jfreeman@kbmlawyers.com